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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

INFINITY CAPITAL MANAGEMENT, INC.
dba INFINITY HEALTH CONNECTIONS;

Debtor.

Case No. 21-14486-abl
Chapter 7

**DECLARATION OF
ROBERT E. ATKINSON**

I, Robert E. Atkinson, hereby declare as follows:

1. I am over the age of 18 and have personal knowledge of the facts stated herein. Such personal knowledge is based upon the records obtained in this case, my own investigations, and discussions with my counsel. I am competent to testify to the same.

2. I make this Declaration in support of my Reply, filed contemporaneously herewith.

3. HASelect and Tecumseh have been cooperating for weeks to identify a servicer for the Tecumseh Receivables, including a tacit agreement to set aside all recoveries pending the outcome of the AP Case, via escrow or some other mechanism. A proposal from a servicer dated October 2021 was circulated by HASelect's counsel to Tecumseh's counsel on November 19, 2021. That proposal included a one-time up-front fee of \$30,000.

4. HASelect has expressly represented to me that if they are the winning bidder, they will set aside all recoveries (after the costs of a servicer are deducted), pending the outcome of the AP Case. I have no issue with the Court making this set-aside a condition of the sale, to address any lingering/latent adequate protection issues.

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Rita

ROBERT E. ATKINSON